

EXHIBIT 7

From: McClammy, James I.
Sent: Friday, November 20, 2020 8:28 AM
To: 'Harold D. Israel'
Cc: Oluwole, Chautney M.; Knudson, Jacquelyn Swanner; Townes, Esther C.;
apreis@akingump.com; Brauner, Sara; Salwen, James; Kevin Thompson; Scott Bickford;
Kent Robbins; Will Kovalchik; Donald Creadore (donald@creadorelawfirm.com); Scott
Markowitz; Hurley, Mitchell; Porter, Katherine; Sheila.Birnbaum@dechert.com;
Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Yeary, Michelle
Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-
Emails.FID1431237]

All—

In advance of our call, we thought it would be helpful to list in one place the “scientific information” we have provided and/or pointed you to to date. As discussed on our call on Monday, we believe the custodians and search terms that have been run to date were/are broad enough to have captured the types of information you are requesting, to the extent it exists in the debtors files. I believe you have access to all of this already through your access to the MDL/civil litigation databases.

- The complete set of NDA files for OxyContin, Hysingla ER, and Butrans. OxyContin: PURCHI-000008528 to PURCHI-003282833 (This can be found at several Bates-ranges because it was produced more than once). Hysingla ER: POK000827212 to POK001852069. Butrans: POK001852071 to POK003274809
 - Note: These include all of the company’s FDA submissions, which would include as applicable, submissions related to licensing and approvals of Purdue’s opioid medications.
- The INDA for OxyContin: PDD8002000001 to PDD8002219555 (Every document in this range may not be part of the INDA, but the INDA documents are included in this range)
- Studies related to oxycodone:
 - DSE-151- In Vitro Chromosomal aberration - PDD1701693617.
 - DSE-060- Reproductive (embryo-fetal—Segment II) Range-Finding Study- Rat - PDD170377016- (2-54) AND PDD1701377332 (209-325).
 - DSE- 061- Reproductive (embryo-fetal—Segment II)- Rat - DSE-061- PDD1701377016 (55-313) AND PDD1701376694 (2-106).
 - DSE-058- Reproductive (embryo-fetal—Segment II) Range-Finding Study- Rabbit - DSE-058- PDD1701376694 (107-257); see also PDD1701694266 (IRDC).
 - DSE-059- Reproductive (embryo-fetal—Segment II)- Rabbit - DSE-059- PDD1701376694 (256-317) AND PDD1701376376 (2-236) AND PDD1701694884 (IRDC).
- Documents from Purdue’s publications database, which reflect Purdue’s internal review of scientific research by Purdue or Purdue employees being evaluated for publication. PPLP003491632 through PPLP004166152.
- Reprints of scientific publications that were approved for distribution to prescribers by sales representatives for the period November 1, 2008 to January 30, 2017. PURCHI-003282840 to PURCHI-003282944.
- Adverse Event Reports, which include clinical observations of *in utero* exposure, if any, to the compounds under study: PPLP004385541 through PPLP004390686.
- Med Watch Reports: Included in PPLPCNC500588670 through PPLPCNC500589138.

In addition, given the search terms applied, it is possible scientific research can be found within the custodial productions.

We can discuss this further on our call this morning. As noted on our Monday call, it is not the case that we have only produced what was provided to FDA and that we are unwilling to search for the information you are requesting (as was suggested in an email to Sheila). Rather, we believe that what has been done to date more than sufficiently covers the requests you have made to the extent such documents are within the debtors' possession and that further expense and effort is not likely to yield anything meaningful.

Best,

J.I.M.

James I. McClammy

Davis Polk & Wardwell LLP

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james.mcclammy@davispolk.com

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From: Harold D. Israel <hisrael@lplegal.com>

Sent: Monday, November 16, 2020 6:38 PM

To: McClammy, James I. <james.mcclammy@davispolk.com>





Cc: Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>; apreis@akingump.com; Brauner, Sara <sbrauner@akingump.com>; Salwen, James <jsalwen@akingump.com>; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Scott Bickford <sbickford@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>; Will Kovalchik <willkoval@gmail.com>; Donald Creadore <donaald@creadorelawfirm.com> <donaald@creadorelawfirm.com>; Scott Markowitz <SMarkowitz@tarterkrinsky.com>; Hurley, Mitchell <mhurley@akingump.com>; Porter, Katherine <kporter@akingump.com>; Sheila.Birnbaum@dechert.com; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Yeary, Michelle <michelle.yeary@dechert.com>

Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

9:00 am eastern on Friday works for the NAS Ad Hoc

Harold

HAROLD D. ISRAEL

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waiver or any mail/facsimile-service of summons or subpoena or other requirements prescribed by applicable state rules of civil procedure or Federal Rule of Civil Procedure 5, but is requested solely as a precautionary measure during our physical office closures. Should you have any questions or concerns regarding this request, please contact the undersigned via email.

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From: McClammy, James I. <james.mcclammy@davispolk.com>

Sent: Monday, November 16, 2020 1:58 PM

To: Harold D. Israel <hisrael@lplegal.com>

Cc: Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>; apreis@akingump.com; Brauner, Sara <sbrauner@akingump.com>; Salwen, James <jsalwen@akingump.com>; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Scott Bickford <sbickford@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>; Will Kovalchik <willkoval@gmail.com>; Donald Creadore <donald@creadorelawfirm.com> <donald@creadorelawfirm.com>; Scott Markowitz <SMarkowitz@tarterkrinsky.com>; Hurley, Mitchell <mhurley@akingump.com>; Porter, Katherine <kporter@akingump.com>; Sheila.Birnbaum@dechert.com; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Yeary, Michelle <michelle.yeary@dechert.com>

Subject: Re: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

I have depositions Thursday and Friday, but could do Friday morning, early (8:30 or 9:00 Eastern) if that works for others.

On Nov 16, 2020, at 2:23 PM, Harold D. Israel <hisrael@lplegal.com> wrote:

We are not available.

Have availability Thursday afternoon or Friday am

Thanks

Harold

HAROLD D. ISRAEL

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From: Oluwole, Chautney M. <chautney.oluwole@davispolk.com>
Sent: Monday, November 16, 2020 12:18 PM
To: Harold D. Israel <hisrael@lplegal.com>; McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>
Cc: apreis@akingump.com; 'Brauner, Sara' <sbrauner@akingump.com>; 'Salwen, James' <jsalwen@akingump.com>; 'Kevin Thompson' <kwthompsonwv@thompsonbarneylaw.com>; 'Scott Bickford' <sbickford@mbfirm.com>; 'Kent Robbins' <khrobbins@kentharrisonrobbins.com>; 'Will Kovalchik' <willkoval@gmail.com>; 'Donald Creadore' (donald@creadorelawfirm.com)' <donald@creadorelawfirm.com>; 'Scott Markowitz' <SMarkowitz@tarterkrinsky.com>; 'Hurley, Mitchell' <mhurley@AkinGump.com>; 'Porter, Katherine' <kporter@akingump.com>; Sheila.Birnbaum@dechert.com; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Yearly, Michelle <michelle.yearly@dechert.com>
Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Thanks, Harold. Could you please let us know your team's availability for a follow up call this Friday afternoon?

Chautney M. Oluwole

Davis Polk & Wardwell LLP

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chautney.oluwole@davispolk.com

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From: Harold D. Israel <hisrael@lplegal.com>
Sent: Monday, November 16, 2020 12:04 PM
To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>
Cc: apreis@akingump.com; 'Brauner, Sara' <sbrauner@akingump.com>; 'Salwen, James' <jsalwen@akingump.com>; 'Kevin Thompson' <kwthompsonwv@thompsonbarneylaw.com>; 'Scott Bickford' <sbickford@mbfirm.com>; 'Kent Robbins' <khrobbins@kentharrisonrobbins.com>; 'Will Kovalchik' <willkoval@gmail.com>; 'Donald Creadore' (donald@creadorelawfirm.com)' <donald@creadorelawfirm.com>; 'Scott Markowitz' <SMarkowitz@tarterkrinsky.com>; 'Hurley, Mitchell' <mhurley@AkinGump.com>; 'Porter, Katherine' <kporter@akingump.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Sheila.Birnbaum@dechert.com
Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Jim and Sheila:

Thank you for your time today. We look forward to your response by noon eastern on November 20, 2020.

Harold

HAROLD D. ISRAEL

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From: Harold D. Israel

Sent: Saturday, November 14, 2020 3:14 PM

To: 'McClammy, James I.' <james.mcclammy@davispolk.com>; 'Knudson, Jacquelyn Swanner'

<jacquelyn.swanner@davispolk.com>; 'Townes, Esther C.' <esther.townes@davispolk.com>

Cc: 'apreis@akingump.com' <apreis@akingump.com>; 'Brauner, Sara' <sbrauner@akingump.com>;

'Salwen, James' <jsalwen@akingump.com>; 'Kevin Thompson'

<kwthompsonwv@thompsonbarneylaw.com>; 'Scott Bickford' <sbickford@mbfirm.com>; 'Kent

Robbins' <khrobbins@kentharrisonrobbins.com>; 'Will Kovalchik' <willkoval@gmail.com>; 'Donald

Creadore' <donald@creadorelawfirm.com>; 'Scott Markowitz'

<SMarkowitz@tarterkrinsky.com>; 'Hurley, Mitchell' <mhurley@AkinGump.com>; 'Porter, Katherine'

<kporter@akingump.com>; 'Oluwole, Chautney M.' <chautney.oluwole@davispolk.com>

Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Jim:

Do we have a time? Updated Availability (eastern):

11-12

1:2:30

3:30-5:00

Harold

From: Harold D. Israel

Sent: Friday, November 13, 2020 12:48 PM

To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner

<jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>

Cc: apreis@akingump.com; Brauner, Sara <sbrauner@akingump.com>; Salwen, James

<jsalwen@akingump.com>; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Scott

Bickford <sbickford@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>; Will

Kovalchik <willkoval@gmail.com>; Donald Creadore' <donald@creadorelawfirm.com>

<donald@creadorelawfirm.com>; Scott Markowitz <SMarkowitz@tarterkrinsky.com>; Hurley, Mitchell

<mhurley@AkinGump.com>; Porter, Katherine <kporter@akingump.com>; Oluwole, Chautney M.

<chautney.oluwole@davispolk.com>

Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Jim:

Thank you. We are available on Monday as follows (eastern):

10-12
1:2:30
3:30-5:00

Harold

From: McClammy, James I. <james.mcclammy@davispolk.com>
Sent: Friday, November 13, 2020 12:35 PM
To: Harold D. Israel <hisrael@lplegal.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>
Cc: apreis@akingump.com; Brauner, Sara <sbrauner@akingump.com>; Salwen, James <jsalwen@akingump.com>; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Scott Bickford <sbickford@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>; Will Kovalchik <willkoval@gmail.com>; Donald Creadore <donald@creadorelawfirm.com>; Scott Markowitz <SMarkowitz@tarterkrinsky.com>; Hurley, Mitchell <mhurley@AkinGump.com>; Porter, Katherine <kporter@akingump.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>
Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Harold –

Thank you for your email and for sending the drafts. We are reviewing and will be discussing this with the clients. It would be helpful for me to get a better understanding of the point made about this discovery being needed to advance the settlement that was reached. I am tied up today, but could be available over the weekend or early Monday morning. Let me know if there is a time that works best for you and I can give you a call.

J.I.M.

From: Harold D. Israel <hisrael@lplegal.com>
Sent: Thursday, November 12, 2020 12:38 PM
To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>
Cc: apreis@akingump.com; Brauner, Sara <sbrauner@akingump.com>; Salwen, James <jsalwen@akingump.com>; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Scott Bickford <sbickford@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>; Will Kovalchik <willkoval@gmail.com>; Donald Creadore <donald@creadorelawfirm.com>; Scott Markowitz <SMarkowitz@tarterkrinsky.com>; Hurley, Mitchell <mhurley@AkinGump.com>; Porter, Katherine <kporter@akingump.com>
Subject: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]
Importance: High

DP Team:

At the NAS Ad Hoc's request, attached please find unredacted drafts of discovery that the NAS Ad Hoc intends on filing on November 16.

Please let us know if you wish to have an additional meet and confer prior to filing.

Harold

HAROLD D. ISRAEL

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